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COURT OF APPEALS  
DIVISION II

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STATE OF WASHINGTON

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DEPUTY

COA No.: 49237-7-II

Jefferson Country Superior Court No.: 00-3-00021-1

IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON  
DIVISION TWO

---

In re the Marriage of:

DOUGLAS URNER  
Appellant

vs.

ELIZABETH VAUGHAN WENNSTROM (fka ELIZABETH VAUGHAN URNER)  
Respondent,

---

ON APPEAL FROM THE JEFFERSON COUNTRY SUPERIOR COURT  
THE HONORABLE KEITH C. HARPER, JUDGE

**APPELLANT'S OPENING BRIEF**

By: Douglas Urner, pro se

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Gig Harbor, WA 98335  
360.769.5565

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## TABLE OF AUTHORITIES

### STATUTES

RCW 26.19.071 – Standards for determination of income.

RCW 26.19.090 – Standards for postsecondary educational support awards.

RCW 26.23.050 – Support orders—Provisions—Enforcement—Confidential  
information form

## I. ASSIGNMENTS OF ERROR

1. The trial court erred when it failed to allow the full retirement contributions made by Douglas as provided by RCW 26.19.071 (5) parts (c) and (g), without a determination that the retirement contributions were made for the purpose of *reducing child support*. The trial court further erred by failing to correct the original error on reconsideration.
2. The trial court erred by including unreimbursed medical expenses without documentation of an actual expense or any information regarding who is benefited and by what treatment.
3. The trial court erred in its application of RCW 26.19.090 (5) when it ordered payment of postsecondary educational expenses beyond age 23 for Isaac without a finding of *exceptional circumstances*.
4. The trial court erred by striking the provisions of the prior arbitration decision that provided a process for the handling of unreimbursed medical expenses without replacing it with another process. The trial court further erred by refusing to correct this error on reconsideration.
5. The trial court erred by failing to provide a means of enforcing and interpreting RCW 26.19.090 (3) and (4).

## II. STATEMENT OF ISSUES

1. Since voluntary retirement contributions, when allowed as deductions, necessarily reduce child support. How can a court reasonably and fairly determine whether or not the deduction was made “for the purpose of reducing child support” for the purposes of RCW 26.19.071 (5g)?
2. Can uninsured medical expenses be built into the child support worksheet without documentation of the expenses?
3. Is a parent who is ordered to pay uninsured medical expenses entitled to the necessary documentation and cooperation necessary to file timely claims for insurance reimbursement?
4. If insurance begins to cover previously uninsured or unreimbursed medical expenses that were built into the child support worksheet is a parent whose transfer payment includes the previously uncovered expense entitled to reimbursement?
5. What constitutes “exceptional circumstances, such as mental, physical, or emotional disabilities” such that a court may deviate from RCW 26.19.090 (5)?

6. When is a court's apparent decision not to consider, or not to act on, factors beyond income in determining postsecondary support under RCW 26.19.090 appealable?
7. Can a court throw out a provision of a previous arbitration decision without finding that the provision was erroneous, is no longer applicable, or replacing it with language designed to address the issue that the arbitration decision attempted to address?
8. Should a court attempt to provide a means for ensuring that there is a way to ensure compliance with RCW 26.19.090 without needing to return to court? Specifically how can RCW 26.19.090 (3) be meaningful absent compliance with RCW 26.19.090 (4) and what means should a court order to ensure compliance without unnecessary litigation?

### III. STATEMENT OF FACTS

- A. Douglas Urner (date of birth 30 October, 1953), the appellant, is a public school teacher covered under the state Teacher Retirement System Plan 3. **CP 357-368** (paystubs showing TRS3 employee deductions).

Prior to February 2015 Douglas was making pension payments at the mandatory default amount allowed by the plan, 5%. That amount is shown on his January pay stub. **CP 357**, Employee Deductions, TRS3, as \$263.12. Over the course of the year for 2015 the total amount of the mandatory pension plan payment is 5% of \$69,428.95 or \$3,471.45 which averages to \$289.29/month. **CP 368**.

In January of 2015, in response to a decision by the legislature to no longer allow teachers to make adjustments to their retirement contributions, Douglas increased his retirement to the maximum contribution allowed, 15%. The new contribution amount is reflected in his February paycheck, issued on the 27<sup>th</sup> of February 2015. **CP 358**, Employee Deductions, TRS3, \$849.99.

In 2015, Douglas earned \$69,428.95. **CP 368**.

In the court's decision, on the child support worksheet no deduction

was allowed for mandatory pension plan payments at line 2e. A deduction of \$220.92 was given for voluntary pension plan payments at line 2f. **CP 490.**

Elizabeth approached Douglas to discuss postsecondary child support on the 26<sup>th</sup> of February 2015. **CP 426.**

Elizabeth did not reveal that she had been laid off from her job at Microsoft in September of 2014 until the 28<sup>th</sup> of February. **CP 430.**

B. The child support worksheets entered in this decision include, on line 10b, the amount of \$370.61 for Uninsured Monthly Health Care Expenses Paid for Children. **CP 491.**

C. Isaac took an extra year of high school to pursue an International Baccalaureate diploma from the Atlantic College campus of United World College, in Wales. He graduated in May of 2013. **CP 472.**

Isaac then attended Deep Springs College during the fall of 2013 and the spring of 2014. Starting in the January of 2015 he attended Evergreen State College for two quarters. After Evergreen Isaac enrolled at Leiden University College The Hague (in The Netherlands) where he began in the fall of 2015. **CP 472-473.**



Isaac took a leave from Leiden in the spring of 2016 to volunteer as a search and rescue lifeguard, assisting with refugee relief efforts in Greece. **CP 456.**

Postsecondary support for Isaac has been ordered beyond his 23<sup>rd</sup> birthday. **CP 476.**

D. In 2008 we engaged in arbitration with *Robert Beattie, Esq.* the arbitration resulted in a process for handling of unreimbursed medication expenses. **CP 7-8.**

E. The current orders require, but do not provide any way to enforce RCW 26.19.090 (4). The current support orders were omitted when compiling the list of clerk's papers. They are attached as Exhibit A. **Exhibit A, page 9, 3.23 Other.**

#### IV. ARGUMENTS

**A: The deduction of mandatory pension plan payments, per RCW**

**26.19.071(c), must be allowed.**

The mandatory default pension plan payment for the Teachers Retirement System Plan 3 is 5%. Based on Douglas' 2015 income of \$69,428.95 (from his final 2015 paystub, **CP 368**), the mandatory retirement contribution is \$3,471.45 or \$289.29/month.

It is unclear how the court arrived at the value of \$220.92 used on the child support worksheet, or why the court placed this amount on the Voluntary Retirement Contributions line (2f, instead of 2e). **CP 490.**

This amount should be corrected and placed on the appropriate line of the worksheet.

**B: Voluntary retirement contributions, made in good faith, must, in compliance with RCW 26.19.071, be allowed in full absent a finding that the intent of the contribution is to reduce child support payments.**

All of the items allowed under part (5) of RCW 26.19.071 have the effect of reducing child support payments. So the simple fact that a voluntary retirement contribution reduces the support obligation does not, in and off itself, prove that the "contributions were made for the purpose of reducing child support." Further the RCW requires that a determination be made to this affect.

In this case no such determination was made. Further, when there is strong evidence that a party has inadequate retirement savings, and a short time window in which to put aside money for retirement, there can be no such determination. In such a case it is clear that the purpose of making the retirement contribution is to have money for one's impending retirement.

Only in cases where retirement is far off, or future opportunities to save for retirement seem ensured, or there is direct evidence of intent to use this provision to manipulate the child support obligation would it be reasonable to make such a determination.

Douglas should be allowed full credit for his voluntary retirement contributions up to the limit allowed by RCW 26.19.071 (5g). Specifically he should be allow the full \$5,000/year (\$416.66/month).

**C: RCW 26.23.050 and principles of fairness require that expenses built in to the child support worksheet be appropriate and ongoing expenses. This requires documentation of the expenses and a determination that the expenses are likely to continue for the life of the order.**

The uninsured medical expenses claimed on line 10b of the child support worksheet are presented without explanation. There is to no way to know what

expenses are being claimed. There is also no way to know who is benefiting from the expense. As a result there is no way to determine whether or not the expense will last for the life of the agreement. Further, there is no way to tell if the expense should even be considered for inclusion here.

In addition it is not possible to know if different insurance coverage would provide reimbursement for the expense.

Such expenses might be reasonably included, but they must be documented, and supporting materials – original provider bills, explanations of benefits from insurance carriers, and the necessary HIPAA waivers and cooperation necessary to explore alternative coverage must be provided. It is unjust to allow one party to claim expenses that the other must pay while allowing the other party no access to the information that would substantiate the legitimacy of the expenses and pursue better coverage.

The uninsured medical expense on line 10b of the child support worksheet should be stricken and actual expenses should be run through insurance and then submitted for payment. If some expenses prove to be regular and ongoing then the parties may agree to build the expense into the transfer payment. Either of these approaches would provide the “accounting of how the support, including any cash medical support, is being spent to benefit the child” provided for in RCW 26.23.050.

**D: RCW 26.19.090 (5) states, “the court shall not order the payment of postsecondary educational expenses beyond the child's twenty-third birthday, except for exceptional circumstances, such as mental, physical, or emotional disabilities” absent a finding that exceptional circumstances exist, the court must comply and may not order support beyond the twenty-third birthday.**

It seems that the purpose of RCW 26.29.090 is to provide reasonable standards for determining support when the parties are not willing or able to reach an agreement on their own. In part (5) the RCW provides clear guidance to the court indicating that the appropriate reasons for deviation are “exceptional circumstances” and providing examples all of which are described as “disabilities.” It thus provides assurance to parents that, except in exceptional circumstances, they know when their support obligations will end even if communication among the parties has broken down.

In this case there is no finding in Isaac’s case of exceptional circumstances that meets what the legislature seems to mean by “mental, physical, or emotional disabilities.” The singular choice of the word disability – while clearly not intended to be the exclusive test – sets a high standard and the focus of what one imagines the legislature was thinking is clear.

It is also worth emphasizing that RCW 26.19.090 is the “rule of last resort” there is nothing that prevents the parties to a child support action from working to find a better solution, knowing the framework from which a court would decide if they were unable to reach agreement. In this case both Elizabeth and Isaac had multiple opportunities to mediate (or even arbitrate, we had used Robert Beattie in that capacity in the past and Elizabeth had initially proposed that we use him again although for some reason this time she wanted to use him as a mediator instead of as an arbitrator). Given that Elizabeth had the advice of her attorney when she decided to forgo mediation it seems that she must have been aware of RCW 26.19.090 and the age limit in part (5).

No substantial argument for extending postsecondary support for Isaac has been made. The order of child support (omitted from the order for clerk's papers and attached here as Exhibit A) includes a handwritten note stating, at section 2.3 Other on page 2 “Reason for support past age 23 for Isaac, late graduation for high school and health issues delaying his college.”

Isaac's late graduation from high school is the result of a voluntary decision to take an extra year to complete high school so that he could attend the International Baccalaureate program at Atlantic College in Wales. Beyond the assertion of medical withdrawal from Deep Springs College no evidence has been offered to suggest that exceptional circumstances of the sort contemplated by the legislature in RCW 26.19.090 (5) exist.

Further, while the RCW provides a student graduating from high school on a typical schedule five years to complete college, the legislature did not choose to specify the time in that manner. Instead they provided a hard limit of the 23<sup>rd</sup> birthday absent exceptional circumstances. So late graduation does not in itself seem to have been contemplated by the legislature as a reason for extending postsecondary support.

While Isaac's medical reasons for withdrawing from Deep Springs have not been revealed it seems that they do not rise the level of a disability or other significant challenge as suggested by the examples in the RCW – especially in light of Isaac's volunteer work during the spring and summer. In the typical case the five years allowed by the legislature would provide a cushion for health issues that might arise.

For these reasons, postsecondary support should remain subject to the limits of the RCW.

**E: Prior decisions in a case, especially those of long standing should not be thrown out without good reason and without consideration of how to replace them with clearer or more effective provisions.**

Prior to the 2008 arbitration order there was no working process for handling unreimbursed/uninsured medical expenses. During the 2008 arbitration with Robert Beattie he was asked to address this problem and did so. The process he proposed was not perfect, *in particular it did not require that expenses be* presented for payment in a timely manner, but it did put an end to the rancor and litigation around medical expenses.

Despite having stood the test of eight years in practice and without any argument against continuing the process it was dropped in the latest orders. No process was put in its place. This omission was noted and the court was asked to correct it on reconsideration, but the court declined to do so. As a result there is a hole that is likely to lead to unnecessary litigation.

The original 2008 language should be restored or incorporated along with additional language requiring that claims for uninsured medical expenses be submitted within 30 days of the receipt of the explanation of benefits from the insurance company.

**F: In order for RCW 26.19.090 (3) to have any meaning, there must be compliance with part (4). While compliance could be ensured by returning to court that adds an unnecessary burden and expense to both the parties and the court. A means of ensuring compliance should be included in the orders.**



This problem could be easily remedied by requiring that the records and grades required by RCW 26.19.090 (4) be provided to both parents in a timely manner – within 30 days of issuance seems like a reasonable standard – and filed with the court under seal. Any postsecondary support paid during periods of non-compliance will become a credit against the payer's support obligation.

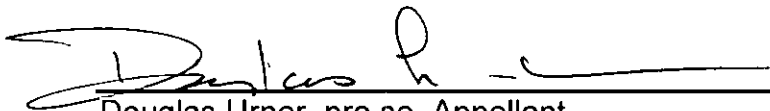
## V. CONCLUSION

- A. Douglas should be allowed full credit for his retirement contributions as allowed by RCW 26.19.071 (5g).
- B. Uninsured medical expenses on line 10b of the child support worksheet should be stricken and actual expenses should be run through insurance and then submitted for payment in accordance with the process defined in E below, or another policy that the parties mutually adopt.
- C. In compliance with RCW 26.19.090 (5) postsecondary support for both children shall not be ordered beyond their twenty-third birthdays.
- D. The original 2008 language detailing how uninsured medical expenses are to be handled should be restored or incorporated along with additional language requiring that claims for uninsured medical expenses be submitted with in 30 days of the receipt of the explanation of benefits from the insurance company.
- E. Language should be added to ensure compliance with RCW 26.19.090 (4).

F. Based on the history of successful mediation and arbitration with Mr. Beattie in this case, and in order to minimize the costs of future actions, mediation should be ordered prior to litigation.

Dated this 29<sup>th</sup> day of August, 2016

Respectfully submitted,



---

Douglas Urner, pro se, Appellant

## Exhibit A

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JEFFERSON COUNTY  
RUTH GORDON, CLERK

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF JEFFERSON

In re the Marriage of: ) No. 00-3-00021-1  
Elizabeth Vaughan Urner )  
(nka Elizabeth Vaughan Urner Wennstrom) ) Order on Modification of  
Petitioner, )  
and ) Child Support  
Douglas Lippincott Urner ) (ORMDD)  
Respondent. )

I. Basis

This order is based upon the findings and conclusions signed by the court.

II. Order

It is Ordered:

[X] The petition for modification of child support is granted. The Order of Child Support signed by the court on this date or dated 15 April 2016, and the child support worksheet, which has been approved by the court, are incorporated by reference as part of this order.

Dated: 15 April 2016

[Signature]  
Judge/Commissioner

Presented by:

Approved for entry.  
Notice of presentation waived.

[Signature]  
Signature of Party or Lawyer/WSBA No.

[Signature]  
Signature of Party or Lawyer/WSBA No.

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FILED

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JEFFERSON COUNTY  
RUTH GORDON, CLERK

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF JEFFERSON

In re the Marriage of:

Elizabeth Vaughan Urner  
(nka Elizabeth Vaughan Urner Wennstrom)  
Petitioner,

and

Douglas Lippincott Urner  
Respondent.

No. 00-3-00021-1

**Findings/Conclusions on  
Petition for Modification of  
Child Support  
(FNFCL)**

**I. Basis**

These findings and conclusions are based upon:

☒ a contested hearing on affidavits only.

**II. Findings and Conclusions**

Based on the case record, the court **finds** and **concludes** that:

**2.1 Jurisdiction**

The court has proper jurisdiction over the parties and subject matter of this action for the reasons that follow:

- ☒ There is a Washington Order of Child Support.  
☒ The nonrequesting party currently resides in the state of Washington.

**2.2 Incorporated Findings**

The child support worksheets which has been approved by the court:

- ☐ is attached to these findings.  
☒ has been initialed and filed separately,

and is incorporated by reference. The Order of Child Support signed by the court on this date or dated 15 April 2016, is incorporated by reference as part of these findings.

1 **2.3 Reasons for Modification**

2 ☒ The order of child support should be modified because:

3 ☒ The previous order was entered more than a year ago and:

4 ☒ The child has moved to a new age category for support purposes.

5 ☒ The child is still in high school and there is a need to extend support  
beyond the child's 18<sup>th</sup> birthday to allow the child to complete high school.

6 ☒ Post-Secondary Educational Support

7 ☒ The right to request post-secondary support was reserved in the support  
order. Isaac Sheldon Jericho Lipponcott Urner, & Rachel Hannah  
8 Pauline Aho'i Urner are in need of post-secondary support because the  
children are in fact dependent and is relying upon the parents for the  
9 reasonable necessities of life. The factual basis is as follows: Isaac has  
been attending post-secondary since 2013 during the pendency of this  
10 action and is and will be continuing in post-secondary education. Rachel  
will be graduating next year and it is apparent she will be continuing onto  
11 post-secondary education. Neither child can support themselves, and are  
dependent upon their parents for support.

12 **2.4 Incremental Increase (RCW 26.09.170(7)(c))**

13 ☒ An incremental increase has not been requested.

14 **2.5 Attorney Fees and Costs**

15 ☒ Attorney's fees and costs should not be ordered because: Both sides shall bear their own  
16 fees and costs.

17 **2.6 Payment Plan**

18 ☒ Payments should be made to the Washington State Support Registry.

19 **2.7 Starting Date of Modified Order**

20 The modified child support order is effective as of this date or on 8 May 2012.

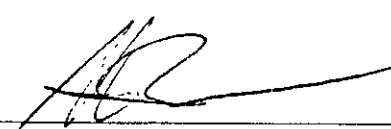
21 ☒ The resulting ☒ underpayment of the child support should be ordered.

22 **2.8 Other**

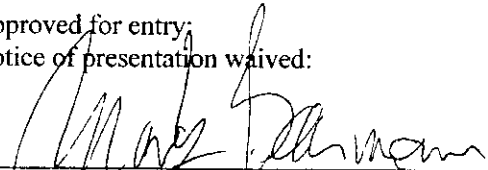
23 Dated: 15 April 2014

24   
25 Judge/Commissioner

1 Presented by:

2   
3  
4 ALTON B. MCFADDEN, WSBA #28861  
Attorney for Elizabeth Urner Wennstrom.

Approved for entry;  
Notice of presentation waived:

  
Signature of Party or Lawyer/WSBA No. 18632

5  
6 Mark Baumann  
Print or Type Name



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15 APR 15 PM 3:38

JEFFERSON COUNTY  
RUTH GORDON, CLERK

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF JEFFERSON

In re the Marriage of:

Elizabeth Vaughan Urner  
(nka Elizabeth Vaughan Urner Wennstrom)  
Petitioner,

and

Douglas Lippincott Urner  
Respondent.

No. 00-3-00021-1

**Order of Child Support**

☐ Temporary (TMORS)

☒ Final Order (ORS)

**Clerk's Action Required**

**I. Judgment Summary**

**1.1 Judgment Summary for Non-Medical Expenses**

☒ Applies as follows:

A. Judgment creditor

Elizabeth Vaughan Urner Wennstrom

B. Judgment debtor

Douglas Lippincott Urner

C. Principal judgment amount (back child support & post-secondary support)

~~\$26,672.68~~ 23,150.07

from (date) May 8, 2012 through (date) April 30, 2016

D. Interest to date of judgment

\$ 0

E. Attorney fees

\$ 0

F. Costs

\$ 0

G. Other recovery amount

\$ 0

H. Principal judgment shall bear interest at 12 % per annum

I. Attorney fees, costs and other recovery amounts shall bear interest at 0 % per annum

J. Attorney for judgment creditor

Alton McFadden

K. Attorney for judgment debtor

Mark Baumann

L. Other:

**1.2 Judgment Summary for Medical Support**

☒ Does not apply.

☐ Applies as follows:

A. Judgment creditor

B. Judgment debtor

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Olsen & McFadden, Inc.,

Attorneys at Law

216 Erickson Ave NE

Bainbridge Island, WA 98110

206-780-0240/ fax 206-780-0318

16.9 00103 8

C. Judgment for medical support \$ \_\_\_\_\_  
from (date) \_\_\_\_\_ through (date) \_\_\_\_\_  
D. Interest to date of judgment \$ \_\_\_\_\_  
E. Attorney fees \$ \_\_\_\_\_  
F. Costs \$ \_\_\_\_\_  
G. Principal judgment shall bear interest at 12 % per annum  
H. Attorney fees, costs and other recovery amounts shall bear interest at \_\_\_\_\_ % per annum  
I. Attorney for judgment creditor \_\_\_\_\_  
J. Attorney for judgment debtor \_\_\_\_\_  
K. Other \_\_\_\_\_

## II. Basis

### 2.1 Type of Proceeding

This order is entered under a petition for dissolution of marriage or domestic partnership, legal separation, or declaration concerning validity:

☒ order for modification of child support.

### 2.2 Child Support Worksheet

The child support worksheet(s) which have been approved by the court are attached to this order and are incorporated by reference or have been initialed and filed separately and are incorporated by reference.

2.3 Other Reason for support part age 23  
for Isaac, late graduation for high school  
and health issues delaying his college

It Is Ordered:

### 3.1 Child(ren) for Whom Support is Required

<u>Name (first/last)</u>	<u>Age</u>
<u>Rachel Hannah Pauline Aho'i Umer</u>	17
<u>Isaac Sheldon Jericho Lippincott Umer</u>	21

### 3.2 Person Paying Support (Obligor)

Name (first/last): Douglas L. Umer  
Birth date: 30 October 1953  
Service Address: 3018 Cabrini Drive NW, Gig Harbor, WA 98335

1  
2 ***The obligor parent must immediately file with the court and the Washington***  
3 ***State Child Support Registry, and update as necessary, the Confidential***  
4 ***Information Form required by RCW 26.23.050.***

5 ***The obligor parent shall update the information required by paragraph 3.2***  
6 ***promptly after any change in the information. The duty to update the***  
7 ***information continues as long as any monthly support remains due or any***  
8 ***unpaid support debt remains due under this order.***

9 For purposes of this Order of Child Support, the support obligation is based upon the following  
10 income:

11 A. ☒ Actual Monthly Net Income: \$ 4,676.60.

12  
13 **3.3 Person Receiving Support (Obligee)**

14 Name (first/last): Elizabeth V. U. Wennstrom

15 Birth date: March 25, 1963

16 Service Address: 3723 San Juan Avenue, Port Townsend, WA 98368

17 ***The obligee must immediately file with the court and the Washington State***  
18 ***Child Support Registry and update as necessary the Confidential***  
19 ***Information Form required by RCW 26.23.050.***

20 ***The obligee shall update the information required by paragraph 3.2***  
21 ***promptly after any change in the information. The duty to update the***  
22 ***information continues as long as any monthly support remains due or any***  
23 ***unpaid support debt remains due under this order.***

24 For purposes of this Order of Child Support, the support obligation is based upon the following  
25 income:

A. ☒ Actual monthly Net Income: \$ 2,307.25.

The obligor may be able to seek reimbursement for day care or special child rearing expenses not  
actually incurred. RCW 26.19.080.

**3.4 Service of Process**

***Service of process on the obligor at the address required by paragraph 3.2***  
***or any updated address, or on the obligee at the address required by***

paragraph 3.3 or any updated address, may be allowed or accepted as adequate in any proceeding to establish, enforce or modify a child support order between the parties by delivery of written notice to the obligor or obligee at the last address provided.

### 3.5 Transfer Payment

The obligor parent shall pay the following amounts per month for the following child(ren):

**A. Rachel Hannah Pauline Aho'i Urner Support until Sept 2017 & POST-SECONDARY SUPPORT FOR Isaac Sheldon Jericho Lippincott Urner**

<u>Name</u>	<u>Amount</u>
<u>Rachel Hannah Pauline Aho'i Urner (until AUG 2017)</u>	<u>\$ 882.13</u>
<u>Isaac Sheldon Jericho Lippincott Urner Starts</u>	
<u>Aug 2015 for 35 months; however, support is</u>	<u>\$634</u>
<u>Suspended March 2016 to June 2016 as Isaac is in relief</u>	
<u>efforts for refugees and resumes as of July 2016 for 2016-17</u>	
<u>school year. Support for Isaac still ends July 2018, 35 months</u>	
<u>from Aug 2015.</u>	

**Total Monthly Transfer Amount UNTIL AUG 2017** \$1516.13

**B. Rachel Hannah Pauline Aho'i Urner Support Starting Sept 2017 POST SECONDARY & POST-SECONDARY SUPPORT FOR Isaac Sheldon Jericho Lippincott Urner**

<u>Name</u>	<u>Amount</u>
<u>Rachel Hannah Pauline Aho'i Urner (starting Sept 2017)</u>	<u>\$ 905</u>
<u>Isaac Sheldon Jericho Lippincott Urner Starts</u>	
<u>Aug 2015 for 35 months</u>	<u>\$634</u>

**Total Monthly Transfer Amount**  
**STARTING SEPT 2017** \$ 1539.00

[X] This is an upward modification that has caused an underpayment of \$ 26,672.68. This amount shall be paid as follows: *Immediately*

*Petitioner is awarded  
Judgment in 3.20 3.22 against Respondent*

**The obligor parent's privileges to obtain or maintain a license, certificate, registration, permit, approval, or other similar document issued by a licensing entity evidencing admission to or granting authority to engage in a profession, occupation, business, industry, recreational pursuit, or the operation of a motor vehicle may be denied or may be suspended if the**

1 **obligor parent is not in compliance with this support order as provided in**  
2 **Chapter 74.20A Revised Code of Washington.**

3 **3.6 Standard Calculation**

4 \$ 1064.37 for Rachel Hannah Pauline Aho'i Urner per month. (See Worksheet line 17.)

5 Isaac Sheldon Jericho Lippincott Urner, is post-secondary, and the guideline amount is advisory  
6 only.

7 **3.7 Reasons for Deviation From Standard Calculation**

8 ☒ The child support amount ordered in paragraph 3.5 deviates from the standard calculation for  
9 the following reasons:

10 ☒ Child(ren) from other relationships:

11 The father has another family with one child. He was granted a whole family  
12 deviation.

13 The factual basis for these reasons is as follows: Mr. Urner has another child GU from a  
14 different relationship he is helping to support.

15 **3.8 Reasons why Request for Deviation Was Denied**

16 ☒ Does not apply. A deviation was ordered.

17 **3.9 Starting Date and Day to Be Paid**

18 Starting Date:

19 8 May 2012, but see section 3.20

20 Day(s) of the month support is due:

21 Monthly on the 5<sup>th</sup> of each month

22 **3.10 Incremental Payments**

23 ☒ Does not apply.

24 ☐ This is a modification of child support. Pursuant to RCW 26.09.170 (9)(a) and (c), the  
25 obligation has been modified by more than 30 percent and the change would cause  
significant hardship. The increase in the child support obligation set forth in Paragraph  
3.5 shall be implemented in two equal increments, one at the time of this order and the  
second on (date) \_\_\_\_\_ six months from the entry of this order.

**3.11 Making Support Payments**

Select Enforcement and Collection, Payment Services Only, or Direct Payment:

☒ Enforcement and collection: The Division of Child Support (DCS) provides support  
enforcement services for this case because: ☐ this is a public assistance case, ☐ this is a  
case in which a parent has requested services from DCS. ☒ a parent has signed the  
application for services from DCS **on the last page of this support order.** (Check all

that apply.) Support payments shall be made to:

Washington State Support Registry  
P. O. Box 45868  
Olympia, WA 98504  
Phone: 1-800-922-4306 or  
1-800-442-5437

A party required to make payments to the Washington State Support Registry will not receive credit for a payment made to any other party or entity. The obligor parent shall keep the registry informed whether he or she has access to health insurance coverage at reasonable cost and, if so, to provide the health insurance policy information.

Any time the Division of Child Support is providing support enforcement services under RCW 26.23.045, or if a party is applying for support enforcement services by signing the application form on the bottom of the support order, the receiving parent might be required to submit an accounting of how the support, including any cash medical support, is being spent to benefit the child(ren).

**3.12**

*Starting AS of 15 April 2016, All support being collected for Post-secondary - for Wage Withholding Action a child being in post secondary after 15 April 2016 - shall be disbursed to the child.*

Withholding action may be taken against wages, earnings, assets, or benefits, and liens enforced against real and personal property under the child support statutes of this or any other state, without further notice to the obligor parent at any time after entry of this order unless an alternative provision is made below:

[If the court orders immediate wage withholding in a case where Division of Child Support does not provide support enforcement services, a mandatory wage assignment under Chapter 26.18 RCW must be entered and support payments must be made to the Support Registry.]

**3.13 Termination of Support**

Support shall be paid:

[X] until the child(ren) reach(es) the age of 18 or as long as the child(ren) remain(s) enrolled in high school, whichever occurs last, except as otherwise provided below in Paragraph 3.14.

**3.14 Post Secondary Educational Support**

[X] The parents shall pay for the post secondary educational support of the child(ren). Post secondary support provisions have been decided by the court, are incorporated above.

**3.15 Payment for Expenses not Included in the Transfer Payment**

[X] Does not apply because all payments, except medical, are included in the transfer payment.

**3.16 Periodic Adjustment**

Page - 6

*If support can't be paid directly to the children, then the parents shall be paid directly by the parent to the child.*

Olsen & McFadden, Inc.,  
Attorneys at Law  
216 Erickson Ave NE  
Bainbridge Island, WA 98110  
206-780-0240/ fax 206-780-0318

- [X] Child support shall be adjusted periodically as follows:
1. Rachel Hannah Pauline Aho'i Urner (Jan 2015 until Aug 2017) support shall be \$ 882.13 per month.
  2. Rachel Hannah Pauline Aho'i Urner (starting Sept 2017) support shall be \$ 905 per month until completion of post-secondary education.
  3. If the average annual costs of the five Washington state colleges should change, the amount of support for Rachel shall be adjusted according to the memorandum opinion of Judge Harper filed 28 March 2016. The parents shall split 2/3rds of the average costs, by their respective worksheet percentages: 67% for the Father and 33% for the mother.

### 3.17 Income Tax Exemptions

- [X] Tax exemptions for the child(ren) shall be allocated as follows:

Because of back support amounts owed, Mrs. Wennstrom shall be entitled to the income tax dependency exemption for Rachel and Isaac for 2015, and for as long as judgment amounts remain unpaid.

*Starting if current support IN 2016*

*Rachel*  
If all back judgment amounts are satisfied before the end of any year, Mr. Urner will be entitled to one child's income tax dependency exemption for said year. Once Isaac is no longer dependent, and as long as support remains current with no back support owed, the parents will alternate years receiving the exemption until Rachel finishes high school and is no longer eligible for basic support.

*The first year only Rachel is claimed will start with Petitioner*

- [X] The parents shall sign the federal income tax dependency exemption waiver.

*with Petitioner*  
Under federal law, the parent who claims the income tax exemption for the child may be subject to a tax penalty if the child does not have medical insurance coverage

### 3.18 Medical Support – Health Insurance

Both parents shall be responsible for ensuring the child(ren) listed in paragraph 3.1 are covered by health insurance coverage, as follows:

#### 3.18.1 Health Insurance

Both parties' obligation:

If the child(ren) are receiving state financed medical coverage, the Division of Child Support may enforce the responsible parent's monthly premium.

The parent(s) shall maintain health insurance coverage, if available for the child(ren) listed in paragraph 3.1, until further order of the court or until health insurance is no longer available through the parents' employer or union and no conversion privileges exist to continue coverage following termination of employment.

A parent who is required under this order to provide health insurance coverage is liable

1 for any covered health care costs for which that parent receives direct payment from an  
2 insurer.

3 A parent who is required under this order to provide health insurance coverage shall  
4 provide proof that such coverage is available or not available within 20 days of the entry  
5 of this order to the other parent or the Washington State Support Registry if the parent  
6 has been notified or ordered to make payments to the Washington State Support Registry.

7 If proof that health insurance coverage is available or not available is not provided within  
8 20 days, the parent seeking enforcement or the Department of Social and Health Services  
9 may seek direct enforcement of the coverage through the other parent's employer or  
10 union without further notice to the other parent as provided under Chapter 26.18 RCW.

### 11 **3.18.2 Change of Circumstances and Enforcement**

12 A parent required to provide health insurance coverage must notify both the Division of Child  
13 Support and the other parent when coverage terminates.

14 If the parents' circumstances change, or if the court has not specified how medical support shall  
15 be provided, the parents' medical support obligations will be enforced as provided in  
16 RCW 26.18.170. If a parent does not provide proof of accessible coverage for the child(ren)  
17 through private insurance, a parent may be required to satisfy his or her medical support  
18 obligation by doing one of the following, listed in order of priority:

- 19 1) Providing or maintaining health insurance coverage through the parent's employment or  
20 union at a cost not to exceed 25% of that parent's basic support obligation;
- 21 2) Contributing the parent's proportionate share of a monthly premium being paid by the  
22 other parent for health insurance coverage for the child(ren) listed in paragraph 3.1 of this  
23 order, not to exceed 25% of the obligated parent's basic support obligation; or
- 24 3) Contributing the parent's proportionate share of a monthly premium paid by the state if  
25 the child(ren) receives state-financed medical coverage through DSHS or HCA (Health  
Care Authority) under RCW 74.09 for which there is an assignment.

A parent seeking to enforce the obligation to provide health insurance coverage may apply for  
support enforcement services from the Division of Child Support; file a motion for contempt (use  
form WPF DRPSCU 05.0100, Motion/Declaration for an Order to Show Cause re Contempt); or  
file a petition.

### 3.19 **Uninsured Medical Expenses**

Both parents have an obligation to pay their share of uninsured medical expenses.

The petitioner shall pay 33 % of uninsured medical expenses (unless stated  
otherwise, the petitioner's proportional share of income from the Worksheet, line 6) and  
the respondent shall pay 67 % of uninsured medical expenses (unless stated  
otherwise, the respondent's proportional share of income from the Worksheet,  
line 6).

### 3.20 **Back Child Support**

Page - 8

Olsen & McFadden, Inc.,  
Attorneys at Law  
216 Erickson Ave NE  
Bainbridge Island, WA 98110  
206-780-0240/ fax 206-780-0318



[X] (Name) Elizabeth Urner Wennstrom <sup>23,150<sup>01</sup></sup> is awarded a judgment against Douglas L. Urner in the amount of \$ 26,672.68 for back child support for the period from (date) May 8, 2012 through (date) April 30, 2016.  
[X] No back interest is owed at this time.

### 3.21 Past Due Unpaid Medical Support

[X] Does not apply

### 3.22 Other Unpaid Obligations

[X] Elizabeth Urner-Wennstrom is awarded a judgment against Douglas Lippincott Urner in the amount of \$9561.00, for post secondary for Isaac for the period from Sept 2013 through the present date. This award is included in paragraph 3.20 above and in the judgment summary at paragraph 1.1. *This is already included in 3.20.*

### 3.23 Other ~~For~~ *The children shall stay in compliance with RCW 26.19.090*

Dated: 15 April 2016

*W. Wennstrom*  
Judge/Commissioner

Presented by:

Approved for entry:

Notice of presentation waived:

*Anton B. McFadden*  
Signature of Party or Lawyer/WSBA No.

*Mark Baumann*  
Signature of Party or Lawyer/WSBA No.

*Anton B. McFadden*  
Print Name

*Mark Baumann* WSBA #  
Print Name *18632*

[X] I apply for full support enforcement services from the DSHS' Division of Child Support (DCS).  
(Note: If you never received TANF, tribal TANF, or AFDC, an annual \$25 fee applies if over \$500 is disbursed on a case, unless the fee is waived by DCS.)

*Anton B. McFadden*  
Signature of Party

*Post secondary support for Rachel shall in no circumstance be required for any degree higher than 4-year bachelor level.*

FILED

16 APR 15 PM 3:38

JEFFERSON COUNTY  
RUTH GORDON, CLERK

## Washington State Child Support Schedule Worksheets

[ ] Proposed by [ ] [ ] State of WA [ ] Other (CSWP)  
Or, [ ] Signed by the Judicial/Reviewing Officer. (CSW)

County JEFFERSON

Case No. 00-3-00021-1

Child/ren and Age/s: Isaac Umer, 21; Rachel Umer, 16

Parent 1 Elizabeth

Parent 2 Douglas

	Parent 1	Parent 2
<b>Part I: Income</b> (see Instructions, page 6)		
<b>1. Gross Monthly Income</b>		
a. Wages and Salaries	-	\$5,753.75
b. Interest and Dividend Income	-	-
c. Business Income	\$4,214.55	-
d. Maintenance Received	-	-
e. Other Income	\$1,216.09	-
f. Imputed Income	-	-
g. Total Gross Monthly Income (add lines 1a through 1f)	\$5,430.64	\$5,753.75
<b>2. Monthly Deductions from Gross Income</b>		
a. Income Taxes (Federal and State) Tax Year: Manual	\$296.70	\$330.57
b. FICA (Soc. Sec.+Medicare)/Self-Employment Taxes	\$405.26	\$440.16
c. State Industrial Insurance Deductions	-	-
d. Mandatory Union/Professional Dues	-	\$85.50
e. Mandatory Pension Plan Payments	-	-
f. Voluntary Retirement Contributions	\$416.66	\$220.92
g. Maintenance Paid	-	-
h. Normal Business Expenses	\$2,004.77	-
i. Total Deductions from Gross Income (add lines 2a through 2h)	\$3,123.39	\$1,077.15
<b>3. Monthly Net Income (line 1g minus 2i)</b>	\$2,307.25	\$4,676.60
<b>4. Combined Monthly Net Income (line 3 amounts combined)</b>		\$6,983.85
<b>5. Basic Child Support Obligation (Combined amounts →)</b>		
Isaac Umer \$946.00		
Rachel Umer \$946.00		
		\$1,892.00
<b>6. Proportional Share of Income (divide line 3 by line 4 for each parent)</b>	.330	.670

EXHIBIT C

	Parent 1	Parent 2
<b>Part II: Basic Child Support Obligation</b> (see Instructions, page 7)		
7. Each Parent's Basic Child Support Obligation without consideration of low income limitations (Each parent's Line 6 times Line 5.)	\$624.36	\$1,267.64
8. Calculating low income limitations: Fill in only those that apply.		
Self-Support Reserve: (125% of the Federal Poverty Guideline.)	\$1,238.00	
a. Is combined Net Income Less Than \$1,000? If yes, for each parent enter the presumptive \$50 per child.	-	-
b. Is Monthly Net Income Less Than Self-Support Reserve? If yes, for that parent enter the presumptive \$50 per child.	-	-
c. Is Monthly Net Income equal to or more than Self-Support Reserve? If yes, for each parent subtract the self-support reserve from line 3. If that amount is less than line 7, enter that amount or the presumptive \$50 per child, whichever is greater.	-	-
9. Each parent's basic child support obligation after calculating applicable limitations. For each parent, enter the lowest amount from line 7, 8a - 8c, but not less than the presumptive \$50 per child.	\$624.36	\$1,267.64
<b>Part III: Health Care, Day Care, and Special Child Rearing Expenses</b> (see Instructions, page 8)		
10. Health Care Expenses		
a. Monthly Health Insurance Premiums Paid for Child(ren)	-	-
b. Uninsured Monthly Health Care Expenses Paid for Child(ren)	\$370.61	-
c. Total Monthly Health Care Expenses (line 10a plus line 10b)	\$370.61	-
d. Combined Monthly Health Care Expenses (add parent 1's and parent 2's totals from line 10c)	\$370.61	
11. Day Care and Special Expenses		
a. Day Care Expenses	-	-
b. Education Expenses	-	-
c. Long Distance Transportation Expenses	-	-
d. Other Special Expenses (describe)		
	-	-
	-	-
	-	-
e. Total Day Care and Special Expenses (Add lines 11a through 11d)	-	-
12. Combined Monthly Total Day Care and Special Expenses (add parent 1's and parent 2's day care and special expenses from line 11e)	-	
13. Total Health Care, Day Care, and Special Expenses (line 10d plus line 12)	\$370.61	
14. Each Parent's Obligation for Health Care, Day Care, and Special Expenses (multiply each number on line 6 by line 13)	\$122.30	\$248.31
<b>Part IV: Gross Child Support Obligation</b>		
15. Gross Child Support Obligation (line 9 plus line 14)	\$746.66	\$1,515.95

	Parent 1	Parent 2
<b>Part V: Child Support Credits</b> (see Instructions, page 9)		
<b>16. Child Support Credits</b>		
a. Monthly Health Care Expenses Credit	\$370.61	-
b. Day Care and Special Expenses Credit	-	-
c. Other Ordinary Expenses Credit (describe)	-	-
	-	-
d. Total Support Credits (add lines 16a through 16c)	\$370.61	-
<b>Part VI: Standard Calculation/Presumptive Transfer Payment</b> (see Instructions, page 9)		
17. Standard Calculation (line 15 minus line 16d or \$50 per child whichever is greater)	\$376.05	\$1,515.95
<b>Part VII: Additional Informational Calculations</b>		
18. 45% of each parent's net income from line 3 (.45 x amount from line 3 for each parent)	\$1,038.26	\$2,104.47
19. 25% of each parent's basic support obligation from line 9 (.25 x amount from line 9 for each parent)	\$156.09	\$316.91
<b>Part VIII: Additional Factors for Consideration</b> (see Instructions, page 9)		
<b>20. Household Assets</b> (List the estimated value of all major household assets.)		
a. Real Estate	-	-
b. Investments	-	-
c. Vehicles and Boats	-	-
d. Bank Accounts and Cash	-	-
e. Retirement Accounts	-	-
f. Other: (describe)	-	-
	-	-
	-	-
	-	-
<b>21. Household Debt</b> (List liens against household assets, extraordinary debt.)		
a.	-	-
b.	-	-
c.	-	-
d.	-	-
e.	-	-
f.	-	-
<b>22. Other Household Income</b>		
a. Income Of Current Spouse or Domestic Partner (if not the other parent of this action)		
Name Erik Wennstrom	\$2,669.34	-
Name Heidi Steele	-	\$5,548.00
b. Income Of Other Adults in Household		
Name	-	-
Name	-	-

**WSCSS-Worksheets – Mandatory (CSW/CSWP) 07/2015 Page 4 of 5**

Other Factors For Consideration (continued) (attach additional pages as necessary)

**Signature and Dates**

I declare, under penalty of perjury under the laws of the State of Washington, the information contained in these Worksheets is complete, true, and correct.

Parent 1's Signature

Parent 2's Signature

April 8, 2016

Port Townsend, WA

Date

City

Date

City

Judicial/Reviewing Officer

Date

This Worksheet has been certified by the State of Washington Administrative Office of the Courts.  
Photocopying of the worksheet is permitted.

### Whole Family Formula Deviation

County: JEFFERSON

Case No.: 00-3-00021-1

Parent 1: Elizabeth

Parent 2: Douglas

**Names and Birthdates of Children For Whom Support Is Being Determined:**

Isaac  
Rachel

**Names and Birthdates of Additional Children For Whom Parent 2 Is Responsible:**

G.U. Age 14

**1. Parent 2's BASIC CHILD SUPPORT OBLIGATION**  
(From Worksheet, Line 7)

\$1,267.64

**2. Number of ALL Children**  
Parent 2 Is Legally Responsible For:

3

**3. Per Child BASIC SUPPORT OBLIGATION**  
Using ALL Children To Reference  
Columns In Child Support Table.  
(Per WHOLE FAMILY FORMULA Instructions).

Isaac	\$790.00
Rachel	\$790.00
	-
	-
	-

**4. BASIC CHILD SUPPORT OBLIGATION**  
(Using WHOLE FAMILY FORMULA)

\$1580.00

**5. Parent 2's Proportional Share of Income**  
(From Worksheet, Line 6)

.670

**6. Parent 2's BASIC SUPPORT OBLIGATION**  
(Line 4 times Line 5)

**7. WHOLE FAMILY FORMULA DEVIATION AMOUNT**  
(Line 1 minus Line 6)

\$209.04

**8. Parent 2's Net Support Obligation/Presumptive Support Amount**  
(From Worksheet, Line 17)

\$1,515.95

**9. WHOLE FAMILY FORMULA DEVIATION AMOUNT**  
(Line 7)

\$209.04

**10. Transfer Payment AFTER Applying WHOLE FAMILY FORMULA**  
(Line 8 minus Line 7)

\$1,306.91

FILED

16 APR 15 PM 3:38

JEFFERSON COUNTY  
RUTH GORDON, CLERK

## Washington State Child Support Schedule Worksheets

☐ Proposed by ☐ ☐ State of WA ☐ Other (CSWP)  
Or, ☐ Signed by the Judicial/Reviewing Officer. (CSW)

County JEFFERSON

Case No. 00-3-00021-1

Child/ren and Age/s: Rachel Umer U, 16

Parent 1 Elizabeth

Parent 2 Douglas

	Parent 1	Parent 2
<b>Part I: Income</b> (see Instructions, page 6)		
1. Gross Monthly Income		
a. Wages and Salaries	-	\$5,753.75
b. Interest and Dividend Income	-	-
c. Business Income	\$4,214.55	-
d. Maintenance Received	-	-
e. Other Income	\$1,216.09	-
f. Imputed Income	-	-
g. Total Gross Monthly Income (add lines 1a through 1f)	\$5,430.64	\$5,753.75
2. Monthly Deductions from Gross Income		
a. Income Taxes (Federal and State) Tax Year: Manual	\$296.70	\$330.57
b. FICA (Soc. Sec. + Medicare)/Self-Employment Taxes	\$405.26	\$440.16
c. State Industrial Insurance Deductions	-	-
d. Mandatory Union/Professional Dues	-	\$85.50
e. Mandatory Pension Plan Payments	-	-
f. Voluntary Retirement Contributions	\$416.66	\$220.92
g. Maintenance Paid	-	-
h. Normal Business Expenses	\$2,004.77	-
i. Total Deductions from Gross Income (add lines 2a through 2h)	\$3,123.39	\$1,077.15
3. Monthly Net Income (line 1g minus 2i)	\$2,307.25	\$4,676.60
4. Combined Monthly Net Income (line 3 amounts combined)		\$6,983.85
5. Basic Child Support Obligation (Combined amounts →) Rachel Umer U      \$1218.00 - - -		\$1,218.00
6. Proportional Share of Income (divide line 3 by line 4 for each parent)	.330	.670

EXHIBIT B



	Parent 1	Parent 2
<b>Part II: Basic Child Support Obligation</b> (see Instructions, page 7)		
7. Each Parent's Basic Child Support Obligation without consideration of low income limitations (Each parent's Line 6 times Line 5.)	\$401.94	\$816.06
8. Calculating low income limitations: Fill in only those that apply.		
Self-Support Reserve: (125% of the Federal Poverty Guideline.)	\$1,238.00	
a. Is combined Net Income Less Than \$1,000? If yes, for each parent enter the presumptive \$50 per child.	-	-
b. Is Monthly Net Income Less Than Self-Support Reserve? If yes, for that parent enter the presumptive \$50 per child.	-	-
c. Is Monthly Net Income equal to or more than Self-Support Reserve? If yes, for each parent subtract the self-support reserve from line 3. If that amount is less than line 7, enter that amount or the presumptive \$50 per child, whichever is greater.	-	-
9. Each parent's basic child support obligation after calculating applicable limitations. For each parent, enter the lowest amount from line 7, 8a - 8c, but not less than the presumptive \$50 per child.	\$401.94	\$816.06
<b>Part III: Health Care, Day Care, and Special Child Rearing Expenses</b> (see Instructions, page 8)		
10. Health Care Expenses		
a. Monthly Health Insurance Premiums Paid for Child(ren)	-	-
b. Uninsured Monthly Health Care Expenses Paid for Child(ren)	\$370.61	-
c. Total Monthly Health Care Expenses (line 10a plus line 10b)	\$370.61	-
d. Combined Monthly Health Care Expenses (add parent 1's and parent 2's totals from line 10c)	\$370.61	
11. Day Care and Special Expenses		
a. Day Care Expenses	-	-
b. Education Expenses	-	-
c. Long Distance Transportation Expenses	-	-
d. Other Special Expenses (describe)	-	-
	-	-
	-	-
e. Total Day Care and Special Expenses (Add lines 11a through 11d)	-	-
12. Combined Monthly Total Day Care and Special Expenses (add parent 1's and parent 2's day care and special expenses from line 11e)	-	
13. Total Health Care, Day Care, and Special Expenses (line 10d plus line 12)	\$370.61	
14. Each Parent's Obligation for Health Care, Day Care, and Special Expenses (multiply each number on line 6 by line 13)	\$122.30	\$248.31
<b>Part IV: Gross Child Support Obligation</b>		
15. Gross Child Support Obligation (line 9 plus line 14)	\$524.24	\$1,064.37

	Parent 1	Parent 2
<b>Part V: Child Support Credits</b> (see Instructions, page 9)		
<b>16. Child Support Credits</b>		
a. Monthly Health Care Expenses Credit	\$370.61	-
b. Day Care and Special Expenses Credit	-	-
c. Other Ordinary Expenses Credit (describe)	-	-
	-	-
d. Total Support Credits (add lines 16a through 16c)	\$370.61	-
<b>Part VI: Standard Calculation/Presumptive Transfer Payment</b> (see Instructions, page 9)		
17. Standard Calculation (line 15 minus line 16d or \$50 per child whichever is greater)	\$153.63	\$1,064.37
<b>Part VII: Additional Informational Calculations</b>		
18. 45% of each parent's net income from line 3 (.45 x amount from line 3 for each parent)	\$1,038.26	\$2,104.47
19. 25% of each parent's basic support obligation from line 9 (.25 x amount from line 9 for each parent)	\$100.49	\$204.02
<b>Part VIII: Additional Factors for Consideration</b> (see Instructions, page 9)		
<b>20. Household Assets</b> (List the estimated value of all major household assets.)		
a. Real Estate	\$196,737.00	-
b. Investments	-	-
c. Vehicles and Boats	\$18,427.00	-
d. Bank Accounts and Cash	\$2,800.00	-
e. Retirement Accounts	\$75,283.00	-
f. Other: (describe)	-	-
	-	-
	-	-
	-	-
<b>21. Household Debt</b> (List liens against household assets, extraordinary debt.)		
a. 401k	\$27,725.00	-
b. Credit Card Debt	\$24,365.00	-
c. Parent Loans for College Tuition	\$7,618.00	-
d.	-	-
e.	-	-
f.	-	-
<b>22. Other Household Income</b>		
a. Income Of Current Spouse or Domestic Partner (if not the other parent of this action)		
Name Erik WSennstrom	\$2,669.34	-
Name Heidi Steele	-	\$5,548.00
b. Income Of Other Adults in Household		
Name	-	-
Name	-	-

WSCSS-Worksheets – Mandatory (CSW/CSWP) 07/2015 Page 4 of 5

Other Factors For Consideration (continued) (attach additional pages as necessary)

**Signature and Dates**

I declare, under penalty of perjury under the laws of the State of Washington, the information contained in these Worksheets is complete, true, and correct.

Parent 1's Signature

Parent 2's Signature

April 8, 2016

Port Townsend, WA

Date

City

Date

City

Judicial/Reviewing Officer

Date

This Worksheet has been certified by the State of Washington Administrative Office of the Courts.  
Photocopying of the worksheet is permitted.

WSCSS-Worksheets – Mandatory (CSW/CSWP) 07/2015 Page 5 of 5  
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SupportCalc • 2016

# Whole Family Formula Deviation

County: JEFFERSON  
Parent 1: Elizabeth

Case No.: 00-3-00021-1  
Parent 2: Douglas

**Names and Birthdates of Children For Whom Support Is Being Determined:**  
Rachel Urner 09/02/1998

**Names and Birthdates of Additional Children For Whom Parent 2 Is Responsible:**  
G.U.

**1. Parent 2's BASIC CHILD SUPPORT OBLIGATION**  
(From Worksheet, Line 7) \$816.06

**2. Number of ALL Children**  
Parent 2 Is Legally Responsible For: 2

**3. Per Child BASIC SUPPORT OBLIGATION**  
Using ALL Children To Reference  
Columns In Child Support Table.  
(Per WHOLE FAMILY FORMULA Instructions).  
Rachel Urner \$946.00

**4. BASIC CHILD SUPPORT OBLIGATION**  
(Using WHOLE FAMILY FORMULA) \$946.00

**5. Parent 2's Proportional Share of Income**  
(From Worksheet, Line 6) .670

**6. Parent 2's BASIC SUPPORT OBLIGATION**  
(Line 4 times Line 5) \$633.82

**7. WHOLE FAMILY FORMULA DEVIATION AMOUNT**  
(Line 1 minus Line 6) \$182.24

**8. Parent 2's Net Support Obligation/Presumptive Support Amount**  
(From Worksheet, Line 17) \$1,064.37

**9. WHOLE FAMILY FORMULA DEVIATION AMOUNT**  
(Line 7) \$182.24

**10. Transfer Payment AFTER Applying WHOLE FAMILY FORMULA**  
(Line 8 minus Line 7) \$882.13

FILED

16 APR 15 PM 3:38

JEFFERSON COUNTY  
RUTH GORDON, CLERK

## Washington State Child Support Schedule Worksheets

[ ] Proposed by [ ] State of WA [ ] Other (CSWP)  
Or, [ ] Signed by the Judicial/Reviewing Officer. (CSW)

County JEFFERSON

Case No. 00-3-00021-1

Child/ren and Age/s: Rachel Umer, 16

Parent 1 Elizabeth

Parent 2 Douglas

	Parent 1	Parent 2
<b>Part I: Income</b> (see Instructions, page 6)		
1. Gross Monthly Income		
a. Wages and Salaries	\$9,627.92	\$4,955.92
b. Interest and Dividend Income	\$13.66	-
c. Business Income	\$1,122.50	-
d. Maintenance Received	-	-
e. Other Income	-	-
f. Imputed Income	-	-
g. Total Gross Monthly Income (add lines 1a through 1f)	\$10764.08	\$4,955.92
2. Monthly Deductions from Gross Income		
a. Income Taxes (Federal and State) Tax Year: Manual	\$612.58	\$300.25
b. FICA (Soc. Sec. + Medicare)/Self-Employment Taxes	\$524.91	\$280.01
c. State Industrial Insurance Deductions	-	\$69
d. Mandatory Union/Professional Dues	-	\$81.83
e. Mandatory Pension Plan Payments	-	-
f. Voluntary Retirement Contributions	\$416.66	\$220.92
g. Maintenance Paid	-	-
h. Normal Business Expenses	\$1,236.91	-
i. Total Deductions from Gross Income (add lines 2a through 2h)	\$2,791.06	\$883.70
3. Monthly Net Income (line 1g minus 2i)	\$7,973.02	\$4,072.22
4. Combined Monthly Net Income (line 3 amounts combined)	\$12,045.24	
5. Basic Child Support Obligation (Combined amounts →)		
Rachel Umer \$1844.00		\$1,844.00
-		
-		
-		
6. Proportional Share of Income (divide line 3 by line 4 for each parent)	.662	.338

EXHIBIT A

	Parent 1	Parent 2
<b>Part II: Basic Child Support Obligation</b> (see Instructions, page 7)		
7. Each Parent's Basic Child Support Obligation without consideration of low income limitations (Each parent's Line 6 times Line 5.)	\$1,220.73	\$623.27
8. Calculating low income limitations: Fill in only those that apply.		
Self-Support Reserve: (125% of the Federal Poverty Guideline.)	\$1,238.00	
a. Is combined Net Income Less Than \$1,000? If yes, for each parent enter the presumptive \$50 per child.	-	-
b. Is Monthly Net Income Less Than Self-Support Reserve? If yes, for that parent enter the presumptive \$50 per child.	-	-
c. Is Monthly Net Income equal to or more than Self-Support Reserve? If yes, for each parent subtract the self-support reserve from line 3. If that amount is less than line 7, enter that amount or the presumptive \$50 per child, whichever is greater.	-	-
9. Each parent's basic child support obligation after calculating applicable limitations. For each parent, enter the lowest amount from line 7, 8a - 8c, but not less than the presumptive \$50 per child.	\$1,220.73	\$623.27
<b>Part III: Health Care, Day Care, and Special Child Rearing Expenses</b> (see Instructions, page 8)		
10. Health Care Expenses		
a. Monthly Health Insurance Premiums Paid for Child(ren)	-	-
b. Uninsured Monthly Health Care Expenses Paid for Child(ren)	-	-
c. Total Monthly Health Care Expenses (line 10a plus line 10b)	-	-
d. Combined Monthly Health Care Expenses (add parent 1's and parent 2's totals from line 10c)	-	-
11. Day Care and Special Expenses		
a. Day Care Expenses	-	-
b. Education Expenses	-	-
c. Long Distance Transportation Expenses	-	-
d. Other Special Expenses (describe)		
	-	-
	-	-
	-	-
e. Total Day Care and Special Expenses (Add lines 11a through 11d)	-	-
12. Combined Monthly Total Day Care and Special Expenses (add parent 1's and parent 2's day care and special expenses from line 11e)	-	-
13. Total Health Care, Day Care, and Special Expenses (line 10d plus line 12)	-	-
14. Each Parent's Obligation for Health Care, Day Care, and Special Expenses (multiply each number on line 6 by line 13)	-	-
<b>Part IV: Gross Child Support Obligation</b>		
15. Gross Child Support Obligation (line 9 plus line 14)	\$1,220.73	\$623.27

	Parent 1	Parent 2
<b>Part V: Child Support Credits</b> (see Instructions, page 9)		
<b>16. Child Support Credits</b>		
a. Monthly Health Care Expenses Credit	-	-
b. Day Care and Special Expenses Credit	-	-
c. Other Ordinary Expenses Credit (describe)	-	-
	-	-
d. Total Support Credits (add lines 16a through 16c)	-	-
<b>Part VI: Standard Calculation/Presumptive Transfer Payment</b> (see Instructions, page 9)		
17. Standard Calculation (line 15 minus line 16d or \$50 per child whichever is greater)	<b>\$1,220.73</b>	<b>\$623.27</b>
<b>Part VII: Additional Informational Calculations</b>		
18. 45% of each parent's net income from line 3 (.45 x amount from line 3 for each parent)	<b>\$3,587.86</b>	<b>\$1,832.50</b>
19. 25% of each parent's basic support obligation from line 9 (.25 x amount from line 9 for each parent)	<b>\$305.18</b>	<b>\$155.82</b>
<b>Part VIII: Additional Factors for Consideration</b> (see Instructions, page 9)		
<b>20. Household Assets</b> (List the estimated value of all major household assets.)		
a. Real Estate	-	-
b. Investments	-	-
c. Vehicles and Boats	-	-
d. Bank Accounts and Cash	-	-
e. Retirement Accounts	-	-
f. Other: (describe)	-	-
	-	-
	-	-
	-	-
<b>21. Household Debt</b> (List liens against household assets, extraordinary debt.)		
a.	-	-
b.	-	-
c.	-	-
d.	-	-
e.	-	-
f.	-	-
<b>22. Other Household Income</b>		
a. Income Of Current Spouse or Domestic Partner (if not the other parent of this action)		
Name	-	-
Name	-	-
b. Income Of Other Adults in Household		
Name	-	-
Name	-	-

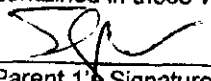





Other Factors For Consideration (continued) (attach additional pages as necessary)

**Signature and Dates**

I declare, under penalty of perjury under the laws of the State of Washington, the information contained in these Worksheets is complete, true, and correct.

	
Parent 1's Signature	Parent 2's Signature
April 8, 2016	
Date	Date
Port Townsend, WA	
City	City

  
Judicial/Reviewing Officer

  
Date

This Worksheet has been certified by the State of Washington Administrative Office of the Courts.  
Photocopying of the worksheet is permitted.

## Whole Family Formula Deviation

County: JEFFERSON

Case No.: 00-3-00021-1

Parent 1: Elizabeth

Parent 2: Douglas

**Names and Birthdates of Children For Whom Support Is Being Determined:**  
                     Rachel   09/02/1998

**Names and Birthdates of Additional Children For Whom Parent 2 Is Responsible:**  
                     GU     Age 14

<b>1. Parent 2's BASIC CHILD SUPPORT OBLIGATION</b> (From Worksheet, Line 7)	\$623.27
<b>2. Number of ALL Children</b> Parent 2 Is Legally Responsible For:	2
<b>3. Per Child BASIC SUPPORT OBLIGATION</b> Using ALL Children To Reference Columns In Child Support Table. (Per WHOLE FAMILY FORMULA Instructions).	
Rachel	\$1440.00
	-
	-
	-
	-
<b>4. BASIC CHILD SUPPORT OBLIGATION</b> (Using WHOLE FAMILY FORMULA)	\$1440.00
<b>5. Parent 2's Proportional Share of Income</b> (From Worksheet, Line 6)	.338
<b>6. Parent 2's BASIC SUPPORT OBLIGATION</b> (Line 4 times Line 5)	\$486.72
<b>7. WHOLE FAMILY FORMULA DEVIATION AMOUNT</b> (Line 1 minus Line 6)	\$136.55
<b>8. Parent 2's Net Support Obligation/Presumptive Support Amount</b> (From Worksheet, Line 17)	\$623.27
<b>9. WHOLE FAMILY FORMULA DEVIATION AMOUNT</b> (Line 7)	\$136.55
<b>10. Transfer Payment AFTER Applying WHOLE FAMILY FORMULA</b> (Line 8 minus Line 7)	\$486.72

FILED  
COURT OF APPEALS  
DIVISION II

2016 AUG 31 AM 11:02

STATE OF WASHINGTON

BY E  
DEPUTY

**Washington State Court of Appeals, Division Two**

In re the marriage of Urner:

Douglas Lippincott Urner, appellant

No. 49237-7-II

And Elizabeth Vaughan Urner, respondent

Proof of Mailing or Hand Delivery  
(for documents after Summons and Petition)  
(AFSR)

**Proof of Mailing or Hand Delivery  
(for documents after Summons and Petition)**

I declare:

1. I am (*check one*): ☒ the Appellant ☐ the Respondent ☐ (*name*): Douglas Urner  
and am competent to be a witness in this case.

2. On (*date*): 17 July 2016, I served copies of the documents listed in **3** below to  
(*name of party or lawyer served*): Alton B. McFadden, II by:

☐ mail (*check all that apply*): ☒ first class ☐ certified ☐ other \_\_\_\_\_

Olsen & McFadden, Inc. PS, 216 Ericksen Ave NE, Bainbridge Island, WA 98110

☒ email to (*address*): alton@olsenmcfadden.com

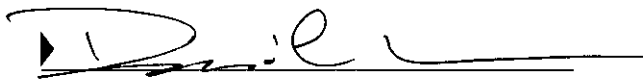
3. List all documents you served (*check all that apply*):

Appellant's Opening Brief

I declare under penalty of perjury under the laws of the state of Washington that the statements  
on this form are true.

Signed at (*city and state*): Gig Harbor, WA

Date: 29 August 2016



Douglas L. Urner  
*Signature of server*